

**From:** Pearce, Bill [mailto:WPearce@sandiego.gov]  
**Sent:** Monday, November 22, 2010 2:00 PM  
**To:** Groundwater Elevation Support; Scruggs, Mary  
**Cc:** Abutin, Larry; Cross, Gregory; Adrian, George; Steirer, Marsi; Pearce, Bill  
**Subject:** RE: Comments on the Draft CASGEM "Procedures for Monitoring Entity Reporting" and the DWR "Groundwater Elevation Monitoring Guidelines" (your letter of November 3, 2010)

Attention: Paula Landis, Chief, Division of Integrated Regional Water Management, California Department of Water Resources, Sacramento, CA

Mary Scruggs, California Department of Water Resources, Sacramento, CA

This email provides comments from the City of San Diego to the Department of Water Resources Groundwater Elevation Monitoring (CASGEM) Program Procedures for Monitoring Entity Reporting. The City overlies several groundwater basins and implementation of CASGEM and any other State groundwater initiative will impact City resources. As such, the City is concerned that where these requirements meet state law, they should also assist the City in the continued preservation, utilization, and development of these groundwater resources.

Following are the City comments:

**A. Draft Procedures for Monitoring Entity Reporting**

1. Please include an explanation in the Procedures (page 4 “if no local entities volunteer...”) describing the conditions under which DWR would take over monitoring of a basin and the conditions under which a basin or sub-basin listed in Bulletin 118 would not need to be monitored?
2. On page 4, reference is made to “local agency that is managing all or part of a groundwater basin pursuant to Water Code Part 2.75...” What is the definition of “managing” a groundwater basin?
3. On page 4, who and how would the following determination be made “...the department may be required to develop a monitoring program.”?
4. On page 14 there is a discussion of data gaps and reasons for data gaps, “...lack of suitable monitoring wells, lack of groundwater use, access issues and jurisdictional issues, among others.” Please include an explanation on how a potential monitoring entity is allowed to exclude from consideration basins/subbasins that are not practical or not useful to monitor?
5. Data Requirements pages 16-19

- a. Some of the required data may not be available, is there flexibility in timing and need for this data?
  - b. Can an entity exclude from monitoring basins/subbasins that are impractical or too expensive to monitor because the basin/subbasin has no wells or has other limitations?
6. Does SB6 10931.(b)(2) mean that if there are no wells to monitor and no State funds to install wells that the basin/subbasin would not need to be monitored?
7. Please include a draft template showing what DWR expects/tentatively thinks the on-line notification submittal will look like.

#### **B. Draft Elevation Monitoring Guidelines**

1. On page the reference is again included “If no local entities volunteer...” Please clarify as discussed in comment #1 above.
2. Could a draft template be included showing what DWR expects/tentatively thinks the on-line data submittal will look like?

#### **General questions:**

1. How will DWR determine if an agency is responsible for “managing” a basin?
2. Is an agency prevented from obtaining grant funds if it does not monitor all the basins listed in Bulletin 118? The language says that if DWR assumed monitoring then there will be no grant funding. How will an agency determine if DWR would or would not assume monitoring?
3. The Bill says that “all” basins listed in Bulletin 118 will be monitored. Is this to be accomplished all at once or as a gradual progression?
4. Will there be any phasing or financial assistance for agencies with multiple basins that are required to comply?
5. Will State/DWR grants be available to assist entities in preparing a groundwater management plan (GWMP) and installing monitoring wells?
6. If the basin does not have a GWMP;
  - a. how will standards be set for the monitoring plan?
  - b. how many and which wells are required to be monitored?
7. If a municipality overlies a basin, has no wells in the basin and is not doing any monitoring...would they be considered by DWR to be responsible for the basin and hence be first on the list to be labeled as a “monitoring entity”?

8. If there are no wells that can be used for monitoring, will the basin still be required to be monitored?
9. When will DWR determine if a basin should be monitored and/or if it is important enough for DWR to assume monitoring?
  - a. Will there be a grace period for agencies before and after DWR undergoes it's process to determine if it will assume monitoring?
10. How will DWR determine if a basin should be monitored?
  - a. What criteria will be used to determine if a basin is to be monitored by DWR?
11. Does DWR have criteria (such as an overdraft condition) for prioritizing which basins will be required to be monitored?
12. If an agency is one of several overlying a basin and their portion is very small (not enough to be the "monitoring entity"), will they be denied funds if the state has to assume monitoring?
  - a. Will multiple agencies within a basin have additional time to enter into cooperative agreements and prepare monitoring plans or GWMP's?
13. Will formations (which may include several basins and entities) be treated differently within the monitoring regulations?
14. If an agency overlies a basin or its service area includes a groundwater basin, does DWR consider that agency to then be responsible for "managing" the basin?

Thank you for the opportunity to comment.

If you have questions, please contact George Adrian (619-533-4680 or [gadrian@sandiego.gov](mailto:gadrian@sandiego.gov)).

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